

### **REMARKS**

Claims 1-28 are now in the application. Claims 13 and 16 have been amended. No claims have been canceled. New claims 21-28 have been added. No new matter has been added.

#### **Claim Rejections - 35 U.S.C. § 102**

Claims 1, 2, 4-8, and 13-16 stand rejected under 35 U.S.C. § 102(e) as being anticipated by United States Patent Number 6,067,551 to Brown et al. Applicants respectfully traverse these rejections and request reconsideration and withdrawal of the rejections in view of the following remarks.

#### **Brown**

Brown provides a multi-user editing capability by utilizing a multi-user control file (MCF) that is created when a document is first accessed. The MCF is comprised of individual record files for the master copy of the document and each user. The MCF includes an assigned name, a date/time number, and a version identifier number. The MCF facilitates the tracking of the version identifier numbers to control the timing and sequence of events when a user opens, saves, and/or closes a document. See Brown Abstract.

#### **Claim 1**

Brown does not disclose each element of claim 1. For example, Brown at least fails to teach or suggest "in response to a determination that the original document is in use by another user, creating a local copy and storing a path of the original document" as recited by claim 1. Brown does not discuss determining whether the original is in use before a local copy is created: Brown teaches that users work in a local copy, not in the original. See id. and col. 12 lines 35-51.

Brown actually teaches away from the method for enabling simultaneous multi-user editing recited by claim 1. Brown teaches that instead of allowing users to open an original or "master" document, users open a local copy which is later reconciled with the master based upon information stored in the MCF. See Figs 2A and 2B (step 255) and col. 12, lines 25-35. In contrast to the method of claim 1, there is no need to determine whether the original document is in use when a user requests to open or save the document, because Brown teaches that users do not typically work directly in the master, but rather use the master only during reconciliation.

See id. and col. 12 lines 35-51. Claims 2-4 are allowable at least because they depend from an allowable independent claim.

#### Claims 5

Independent claim 5 recites "a computer-readable medium having computer-executable instructions for performing steps comprising . . . monitoring the original document; in response to a determination that the original document is no longer in use by another user, notifying the first user that the original document is no longer in use . . . ." In support of the rejection, the Office Action cited, inter alia, the "Reconciliation Procedure" and "Conflict Resolution Procedure" in columns 13 and 14 of Brown. Applicants respectfully traverse the rejection.

Brown merely discusses merging edits into the original (Reconciliation Procedure) and resolving conflicts between a local copy and the original (Conflict Resolution Procedure). Brown does not discuss monitoring the original document and notifying the first user when the original is no longer in use, as recited by claim 5. Brown teaches that editors work in local copies, not the original. Withdrawal of the rejection of claim 5 over Brown is respectfully requested.

#### Claim 13

Independent claim 13 as currently amended recites a system for enabling simultaneous multi-user editing of an original document, comprising:

a file server operative to maintain an original document at a document location;

a document editor operative to make changes to the original document and to set a flag on the original document, the flag indicating that the original document is in use by a first user;

wherein, in response to a determination that the flag is set, the document editor is further operative to create a local copy of the original document and to store the document location with the local copy, and, in response to an attempt to open the stored local copy, to provide a prompt to merge the local copy with the original document.

The Office Action cited Figures 2A-2E and col. 11, lines 43-50 in support of the rejection of claim 13 and claim 16. Applicants' present amendment incorporates the language of claim 16 into claim 13. Applicants respectfully traverse the rejection. Brown at least fails to disclose a document editor operative to provide a prompt to merge the local copy with the original

document in response to an attempt to open the stored local copy as recited by amended claim 13.

There is no teaching or suggestion in Brown to save an edited local copy and later prompt a user to merge edits with the original. Brown discloses that edits to a local copy are merged with the original when the local copy is saved. See, e.g. Figs. 2E-2F, steps 260 to 300. Brown therefore provides no motivation to prompt a user opening a local copy to merge the local copy with the original. Withdrawal of the rejection of claim 4 over Brown is respectfully requested.

Claim 4, 8, and 16

Claim 4, which depends from claim 1, recites that "another user attempting to open the saved local copy will be prompted to merge the saved local copy with the original document." Claim 8, which depends from claim 5, recites "in response to an attempt to open the stored local copy and to a determination that the original document is no longer in use by another user, providing a prompt to merge the local copy with the original document." Claim 16 as currently amended recites the document editor is operative monitor in a background process whether the original document is in use by another user and, if the original document becomes available, to provide a prompt to merge the local copy with the original document.

In support of the rejection of claims 4 and 8 over Brown, the Office Action cited figures 2A-2E figure 3, column 11, lines 15-67, the Reconciliation Procedure (col. 13) and the Conflict Resolution Procedure (col. 14). Applicants respectfully traverse.

Consistent with the above discussion of claim 13, Brown does not discuss prompting a user to merge a saved local copy with an original document when the user attempts to open the saved local copy. Brown provides no discussion of prompting a user to merge a local copy when the local copy is opened and provides no motivation to do so because Brown describes that edits are merged when the local copy is closed. See, e.g. Figs. 2E-2F, steps 260 to 300. Withdrawal of the rejection of claim 4 over Brown is respectfully requested.

**Claims 6 and 14**

Claim 6 recites "the computer-readable medium of claim 5 further comprising the step of "storing the path of the original document as a property of the local copy." Claim 14, which depends from claim 13, also recites that the document location is stored with the local copy as a property of the local copy.

Brown teaches storing information about the local copy and the original in the multi-user control file (MCF). Brown does not teach or discuss storing the path of the original document as a property as recited by claim 6 and 14. Withdrawal of this rejection is respectfully requested.

**Claim 7 and 15**

The Office Action rejected claims 7 and 15 under 35 U.S.C. § 102 in view of Brown, stating "storing the document location associated with the local copy would have been obvious to one of ordinary skill in the art as the point of using registry keys are to sort data using different fields." Applicants respectfully traverse.

Registry keys are not discussed in Brown. To the extent that the Office Action relies on Official Notice, Applicants respectfully traverse and request production of a reference. Brown teaches use of a multi-user control file and there is thus no motivation to store the property information as a registry key associated with the local copy. Applicants respectfully request reconsideration and withdrawal of this rejection.

**Claim Rejections - 35 U.S.C. § 103**

Claims 1, 3, 5, 9, 10, 17, and 18 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Moody et al. (United States Patent Number 5,890,177). Claims 11, 12, 19, and 20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Moody et al. (United States Patent Number 5,890,177) in view of Thorne et al. (United States Patent Number 5,958,005). Applicants respectfully traverse these rejections and request reconsideration and withdrawal of the rejections in view of the following remarks.

Moody et al.

Moody discloses a method and apparatus for consolidating edits made by multiple editors working on multiple document copies. The method and apparatus waits until all the editors have completed edits to their copies before consolidating the edits. See, e.g., col. 4, lines 43-46; accord Office Action p. 7.

Thorne et al

Thorne discloses creating data messages having security parameters which control the processing of the data message in the recipient computer.

Claim 1

Moody fails to teach or suggest each limitation of claim 1. For example, Moody fails to teach or suggest "in response to the receipt of a request to save changes to the local copy, determining whether the original document is still in use by another user" and "in response to a determination that the original document is not still in use by another user, merging the local copy with the original document." To the contrary, Moody waits until all editors have completed their edits. Moody describes that "After each of the editors and the author have edited the original document, the author is ready to consolidate the edited copies to produce the final document." Col. 4, lines 44-46. There is no suggestion in Moody to merge changes at the time that a local copy is saved because Moody explicitly teaches gathering all edited local copies and then merging the edits from the local copies.

Brown and Thorne do not remedy the deficiencies of Moody. Claim 3 is allowable at least because it depends from an allowable independent claim. Withdrawal of the rejection of claims 1 and 3 under 35 U.S.C. § 103 is respectfully requested.

Claim 5

Independent claim 5 recites "a computer-readable medium having computer-executable instructions for performing steps comprising . . . monitoring the original document; in response to a determination that the original document is no longer in use by another user, notifying the first user that the original document is no longer in use . . . ."

Moody does not teach or suggest monitoring the original document and notifying the first user when the original is no longer in use, as recited by claim 5. Moody describes that editors work with copies, not the original. Col. 4, lines 32-34. Moody provides no motivation to monitor use of the original because the editors do not make edits to the original document and the editors do not merge their edits while they are editing.

Brown and Thorne do not remedy the deficiencies of Moody. Withdrawal of the rejection of claim 1 under 35 U.S.C. § 103 is respectfully requested.

#### Claim 13

Claim 13 as currently amended recites "the document editor is further operative to create a local copy of the original document and to store the document location with the local copy, and, in response to an attempt to open the stored local copy, to provide a prompt to merge the local copy with the original document."

Moody does not teach or suggest all the limitations of claim 13. For example, Moody fails to teach or suggest a document editor operative to provide a prompt to merge the local copy with the original document in response to an attempt to open the stored local copy as recited by amended claim 13. To the contrary, Moody teaches that editors of local copies do not conduct merge operations; rather, an author merges edits from local copies to the original. Moody thus provides no motivation to provide a prompt to merge the local copy with the original document when the local copy is opened and in fact teaches away from providing such a prompt because merge operations are specifically reserved for the author after all edits are complete.

Brown and Thorne do not remedy the deficiencies of Moody. Withdrawal of the rejection of claim 1 under 35 U.S.C. § 103 is respectfully requested.

#### Claim 9-12 and 17-20

Claim 9-12 and 17-20 are allowable at least because they depend from an allowable independent claim.

Accordingly, it is believed that the claims fully comply with § 103(a). Applicants respectfully request reconsideration and withdrawal of these rejections.

**SUMMARY**

As all claims now in the application are in condition for allowance, Applicants request the application be allowed and pass to issuance as soon as possible.

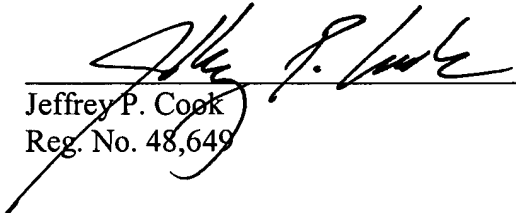
It is believed that no further fees are due with this Response. However, the Commissioner is hereby authorized to charge any deficiencies or credit any overpayment with respect to this patent application to deposit account number 13-2725.

Respectfully submitted,

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